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*Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee for the Pooling and Servicing Agreement Dated as of August 1, 2005 Park Place Securities, Inc. Asset-Backed Pass-Through Certificates Series 2005-WHQ4*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

WELLS FARGO BANK, N.A., AS TRUSTEE  
FOR THE POOLING AND SERVICING  
AGREEMENT DATED AS OF AUGUST 1,  
2005 PARK PLACE SECURITIES, INC.  
ASSET-BACKED PASS-THROUGH  
CERTIFICATES SERIES 2005-WHQ4.

Plaintiff.

VS.

FIDELITY NATIONAL TITLE INSURANCE  
COMPANY.

**Defendant.**

Case No.: 3:19-cv-00237-MMD-CSD

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSE  
TO DEFENDANT'S OPPOSITION AND  
COUNTERMOTION [ECF No. 38-39]**

(Second Request)

Plaintiff, Wells Fargo Bank, N.A., as Trustee for the Pooling and Servicing Agreement  
Dated as of August 1, 2005 Park Place Securities, Inc. Asset-Backed Pass-Through Certificates  
Series 2005-WHQ4 (“Wells Fargo”), and Defendant Fidelity National Title Insurance Company  
 (“Fidelity”, collectively, the “Parties”), by and through their counsel of record, hereby stipulate  
and agree as follows:

1. On July 21, 2022, Wells Fargo filed a Motion for Partial Summary Judgment [ECF No. 33].
2. On August 10, 2022, Fidelity filed its Opposition to Wells Fargo's Motion for Partial Summary Judgment [ECF No. 38] and filed a Countermotion for Partial Summary

1 Judgment [ECF No. 39].

2 3. Wells Fargo's deadline to respond to Fidelity's Opposition and Fidelity's Countermotion  
3 is September 30, 2022 [ECF No. 48].

4 4. Due to an unforeseen personal emergency of counsel, Wells Fargo requests a brief five  
5 (5) day extension of time to file its response to Fidelity's Opposition to Wells Fargo's  
6 Motion for Partial Summary Judgment [ECF No. 38] and Fidelity's Countermotion for  
7 Partial Summary Judgment [ECF No. 39], such that the new deadlines are October 5,  
8 2022.

9 5. Counsel for Fidelity does not oppose the requested extension.

10 6. This is the second request for an extension which is made in good faith and not for  
11 purposes of delay.

12 **IT IS SO STIPULATED.**

13 DATED this 30<sup>th</sup> day of September, 2022.

14 WRIGHT, FINLAY & ZAK, LLP

15 /s/ Lindsay D. Dragon  
16 Lindsay D. Dragon, Esq.  
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17 7785 W. Sahara Ave., Suite 200  
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18 Attorneys for Plaintiff, Wells Fargo Bank,  
N.A., as Trustee for the Pooling and Servicing  
Agreement Dated as of August 1, 2005 Park  
Place Securities, Inc. Asset-Backed Pass-  
Through Certificates Series 2005-WHQ4

DATED this 30<sup>th</sup> day of September, 2022.

SINCLAIR BRAUN LLP

19 /s/ Kevin S. Sinclair  
Kevin S. Sinclair, Esq.  
Nevada Bar No. 12277  
16501 Ventura Boulevard, Suite 400  
Encino, California 91436  
20 Attorney for Defendant, Fidelity National  
Title Insurance Company

21 **IT IS SO ORDERED.**

22 Dated this 3rd day of October, 2022.



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28 UNITED STATES DISTRICT COURT JUDGE